

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BOSS WORLDWIDE LLC, d/b/a ALGO
ONLINE RETAIL,

Plaintiff,

v.

BEAU CRABILL, THOMAS CRABILL, JR.
and ALL OUT RAW LLC,

Defendants.

C.A. No. 19-cv-2363 (VLB)

**DEFENDANTS' NOTICE OF MOTION AND MOTION TO DISMISS
PLAINTIFF'S COMPLAINT UNDER RULES 12(B)(2) AND 12(B)(6) OR,
ALTERNATIVELY, TO TRANSFER PURSUANT TO 28 U.S.C. § 1404(a)**

PLEASE TAKE NOTICE that, on May 20, 2019, upon the accompanying Memorandum of Law, Defendants Beau Crabill, Thomas Crabill, Jr., and All Out Raw LLC (collectively, the "Defendants") move this Court to dismiss the Complaint pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure or, alternatively, to transfer this action to the Western District of Washington pursuant to 28 U.S.C. § 1404(a).

This motion should be granted for the reasons set forth in the accompanying Memorandum of Law, any supporting, opposing, or reply papers which may be filed, and such other arguments and evidence that may be brought before the Court.

Dated: May 20, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2019, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to the attorneys of record.

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Dated: May 20, 2019

By: /s/Jennifer Mavronas
Jennifer Mavronas